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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 NOOR KARIM BUSTAMI, individually,
11 Plaintiff,

12 vs.

13 KENT NEIL DAVIS; individually; WESTERN
14 SPECIALIZED, INC., a Foreign Corporation;
15 DOE INDIVIDUALS 1-20, inclusive; and ROE
CORPORATIONS 1-20, inclusive,
16 Defendants.
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CASE NO.

Defendants' Petition for Removal

18 TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE
19 DISTRICT OF NEVADA:

20 Defendants Kent Neil Davis and Western Specialized Inc. respectfully petition the Court for
21 an Order removing the above-entitled action to the United States District Court and alleges as
22 follows:

23 1. Kent Neil Davis. and Western Specialized Inc. are the Defendants in the above-
24 entitled action.

25 2. The above-entitled action was commenced against Defendants on May 19, 2022, in
26 the Eighth Judicial District Court, Clark County, Nevada, and is now pending in such Court as Case
27 No. A-22-852892-C.
28

1 3. A copy of the Summons and Complaint was served on Western Express on May 23,
2 2022. A copy of the Summons and Complaint was served on Mr. Davis on June 2, 2022. Attached
3 are all of the pleadings which have been filed in the Eighth Judicial District Court.

4 4. Plaintiff alleges that this action is a result of a motor vehicle collision which occurred
5 on September 22, 2021 in Clark County, Nevada. As a result of the accident, Plaintiff alleges that
6 she has sustained certain damages as outlined in Paragraph 5 below.

7 5. The amount in controversy exceeds \$75,000.00. In support of the claim that the
8 amount in controversy exceeds \$75,000.00, Defendants state as follows:

9 A) Ms. Bustami has treated for spinal related injuries. Her medical bills for
10 treatment to date total \$222,694.96. She is also claiming future medical
11 expenses, loss of enjoyment of life, lost income and earning capacity, in
12 addition to pain and suffering all of which are outlined in the complaint.

13 6. There is diversity of citizenship between Plaintiff and Defendants and this Court has
14 jurisdiction over the above-entitled action pursuant to 28 USC § 1332 and 28 USC § 1441:

15 A) Plaintiff is a resident and citizen of Clark County, Nevada.

16 B) Western Specialized is a Minnesota corporation with its principal place of
17 business in Mankato, Minnesota.

18 C) Mr. Davis is a citizen and resident of the State of South Dakota.

19 7. The removal is timely. The removal is timely as it is being filed within thirty (30)
20 days of the May 23, 2022 service of the summons and complaint on Western Specialized and within
21 30 days of the June 2, 2022 service of the summons and complaint on Mr. Davis.

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1 WHEREFORE, Defendants request that the above-entitled action be removed from the
2 Eighth Judicial District Court, Clark County, Nevada to this Court.

3 DATED this 22nd day of June, 2022.

4 STEPHENSON & DICKINSON, P.C.

5 

6 By: _____

7 BRUCE SCOTT DICKINSON, ESQ.

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that I am an employee of STEPHENSON & DICKINSON and that on this 22nd day of June, 2022, I caused to be served a copy of the foregoing:

Defendants' Petition for Removal on the party(s) set forth below by:

_____ Electronic service pursuant to NECFR 9

_____ Placing an original or true copy in a sealed envelope placed for collection and mailing in the United States Mail, at Las Vegas, Nevada, postage prepaid, following ordinary business practices;

_____ Facsimile transmission only, pursuant to the amended Eighth Judicial District Court Rule 7.26

_____ Case Management/Electronic Case Filing (CM/ECF)

_____ X Via email: ps@stevedimopoulos.com

addressed as follows:

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